REVIEW AND COMMENT RECORD

1. Page 1 of 3

2. Date: February 24, 1993

3. Document No./Title:

Draft Technical Memorandum No. 7, Soil Boring Sampling Plan - Ash Pits 1-4, Incinerator, and Concrete

Wash Pad, January, 1993

Reviewer's Name:

Agency: U.S. Environmental Protection Agency

Date: January 4, 1993

Item	Comment(s)	Disposition	Status
1. GENERAL COMMENTS	EPA would like to further emphasize that the Soil Boring Sampling Plan must meet the initial intent of establishing the content and configuration of the trenches and should, to the extent possible, serve to establish the impact of ash disposal on the underlying soils. This will facilitate the remedial decision making process. Thus, it is imperative that soil composites for laboratory analysis be carefully selected to best represent the cover material, ash layer(s), and underlying soils.	This comment is addressed in two separate sections Sections 1.2 and 3.3. Section 1.2 PURPOSE AND SCOPE has been revised to incorporate wording directly from the Work Plan in addition to some of our findings. This section now incorporates EPA's concerns as follows: Soil borings will be drilled to characterize, geologically and chemically, the cover and subsurface materials within and/or downgradient the Ash Pits, Incinerator, and Concrete Wash Pad areas and to characterize the contamination sources at IHSS 133. The soil borings will also assist in assessing the lateral and vertical extent of the ashpits. Additionally, the soil borings are intended to provide information as to whether contaminants exist within the Ash Pits, and if so what contaminants are present, and have these contaminants leached into the soils and/or groundwater beneath or downgradient of the Ash Pits.	Accepted

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostdiek 870
DATE 3-3-93

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1. GENERAL COMMENTS (Continued)		The criteria for selecting soil composite samples has been addressed in Section 3.3 and is explained in the following disposition.	Accepted
2. GENERAL COMMENTS	As currently written, Section 3.3 (Sampling Procedures) is very vague on when, how, and by whom sampling intervals will be selected, and does not appear to specify any criteria for when a hole is terminated. Clear criteria and explicit responsibility for making the necessary field decisions must be established prior to sampling, and documented in the Final Technical Memorandum for the record. A flow chart and/or table illustrating the decision process and the resulting samples and analyses might be a useful addition in this section.	Page 21, third paragraph, has been rewritten as follows to address these issues: An alternative sample method to be followed will be composite sampling based on lithology as opposed to six-foot intervals. The rig geologist will be responsible for implementing this method provided there is a distinct visible lithologic difference between natural geologic materials, artificial fill, ash material and/or visible changes within the ash layer(s). If this distinction can be made during drilling operations, composite samples will be made up of natural geologic materials and artificial fill, and ash materials, separately, and possibly separate subsamples within the ash layer(s) if visible changes occur.	Accepted

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2. GENERAL COMMENTS (Continued)		The criteria for bore hole termination is stated on page 16, paragraph 4, "The borings that are to be installed for the investigation of IHSSs 133.1 - 133.6 will be drilled 6 feet into weathered bedrock. If the bedrock encountered during drilling is a sandstone, the borings will be advanced 6 feet into the next claystone horizon."	Accepted